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November 10, 2009

VIA FACSIMILE ONLY (973) 645-2469Honorable Esther Salas, U.S.M.J.
United States District Court, District of New Jersey
Federal Building and Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *Katz v. Communication Workers of America, AFL/CIO et al.*,
(Civil Action No. 2:08-cv-02395-PSG-ES);
Katz v. Communication Workers of America, AFL/CIO et al.,
(Civil Action No. 2:08-cv-03460-PSG-ES)

Dear Magistrate Judge Salas:

This firm represents plaintiff Carla Katz in the above captioned matters. We submit this request on behalf of Ms. Katz. We respectfully request that plaintiff's pending motion for leave to amend her Complaint, returnable on December 7, 2009, be carried until December 21, 2009. Currently, defendants' opposition to the pending motion is due on Wednesday, November 25, 2009, which schedule provides plaintiff only five days to reply (including the Thanksgiving holiday). We make this request so that Plaintiff may have the usual one week to file her reply papers. Therefore, we respectfully request that plaintiff's pending motion for leave to amend her Complaint be returnable on December 21, 2009. We respectfully make this request in good faith. This request does not extend the discovery end date.

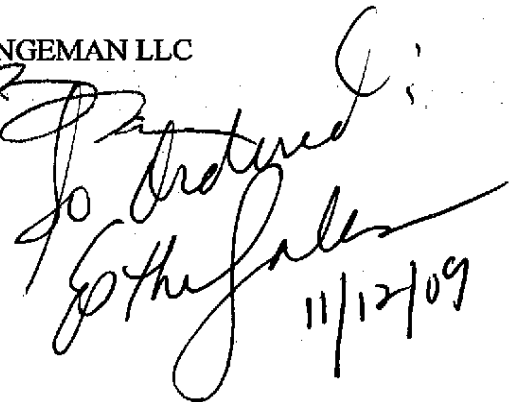
Counsel for the parties have conferred and consent to a proposed new schedule as follows: defendants' opposition would be due on December 7, plaintiff's reply would be due December 14, and plaintiff's motion for leave to amend her Complaint would be returnable on December 21, 2009. Thank you for your consideration.

Respectfully Submitted,

KROVATIN KLINGEMAN LLC


HELEN A. NAU

cc: Stephen B. Moldof, Esq. (via electronic mail)
Domenick Carmagnola, Esq. (via electronic mail)
Carla Katz, Esq.



11/12/09